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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
LUIS ENRIQUE VASQUEZ-LOPEZ,  
  
Defendant.

CASE NO. 2:23-CR-00135-WBS  
  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER  
  
DATE: March 11, 2024  
TIME: 9:00 a.m.  
COURT: Hon. William B. Shubb

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on March 11, 2024.
2. By this stipulation, defendant now moves to continue the status conference until **May 13, 2024, at 9:00 am**, and to exclude time between March 11, 2024, and May 13, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes investigative reports, photographs, drug lab analyses, and audio and video recordings. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

1           b)     Defense counsel was substituted as attorney of record on November 13, 2023.  
2     ECF 22. Since that time, defense counsel has been engaged in several state court jury trials.

3           c)     Counsel for defendant desires additional time to review the discovery, consult  
4     with his client, review the current charges, conduct investigation and research related to the  
5     charges, discuss possible resolutions, and otherwise prepare for trial.

6           d)     Counsel for defendant believes that failure to grant the above-requested  
7     continuance would deny him the reasonable time necessary for effective preparation, taking into  
8     account the exercise of due diligence.

9           e)     The government does not object to the continuance.

10          f)     Based on the above-stated findings, the ends of justice served by continuing the  
11     case as requested outweigh the interest of the public and the defendant in a trial within the  
12     original date prescribed by the Speedy Trial Act.

13          g)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
14     et seq., within which trial must commence, the time period of March 11, 2024 to May 13, 2024,  
15     inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
16     because it results from a continuance granted by the Court at defendant's request on the basis of  
17     the Court's finding that the ends of justice served by taking such action outweigh the best interest  
18     of the public and the defendant in a speedy trial.

19     ///

20     ///

21     ///

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 6, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ ALSTYN BENNETT  
ALSTYN BENNETT  
Assistant United States Attorney


Dated: March 6, 2024

/s/ MATTHEW C. SMITH  
MATTHEW C. SMITH  
Counsel for Defendant  
LUIS ENRIQUE VASQUEZ-LOPEZ

**ORDER**

IT IS SO FOUND AND ORDERED.

Dated: March 7, 2024

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE